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Attorney for Defendants EAST PALO ALTO POLICE OFFICERS
DANIEL CANCELLA and STEVE HUMRICH

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA –OAKLAND

STEVEN YOUNG, et al.,

Plaintiff,

vs.

EAST PALO ALTO POLICE OFFICERS
DANIEL CANCELLA and STEVE
HUMRICH and DOES 1- 50, et al.,

Defendants.

Case No. 4:18-CV-01931-DMR

**DEFENDANTS' PROPOSED TRIAL
EXHIBIT LIST
(F.R.C.P. 26(a)(3))**

Complaint filed: 03/29/18

Pretrial Conf.: February 5, 2020

Time: 3:00 p.m.

Trial: February 18, 2020

Courtroom: 4

Judge: Hon. Donna Ryu, Magistrate

DEFENDANT OFFICERS DANIEL CANCELLA and STEVE HUMRICH hereby submit
this list of exhibits which defendants intend to introduce at the time of trial. Omission of an
exhibit(s) from this list does not preclude defendants from submitting that exhibit(s) at trial.

A. Police Report and Narrative authored by Daniel Cancilla, dated 5/2/17, regarding the
subject incident (with Supplemental Narratives by Steve Humrich, Loren Wutzke, Jose Luaorozco,
Robert Weigand, and a supplemental report by Menlo Park Police Department Officer Tony
Mendoza).

1 B. Body camera footage from body cameras worn by Menlo Park Police Department
2 Seragent Soares,

3 C. Body camera footage (Vievu digital recording) from body camera worn by Menlo
4 Park Police Department Officer Tony Mendoza.

5 D. Expert Report of Jeffrey Martin, dated September 5, 2014

6 Defendants reserve the right to submit any and all exhibits listed by any other party and
7 further reserve the right to supplement this list as further facts, analysis, evidence, issues, and or
8 circumstances indicate. Defendants further reserve the right to present additional exhibits for the
9 purpose of rebuttal, impeachment, or legitimate surprise.

10 Further, defendants reserve the right to refer to or offer into evidence any document
11 identified by any party hereto in their Exhibit Lists. Defendants further reserve the right to refer to,
12 read from or offer into evidence any and all depositions taken in this matter, and any and all
13 discovery requests and responses in this matter. No inference should be drawn that because these
14 defendants may have specifically referenced some discovery or depositions herein above that,
15 therefore, defendants are waiving the right to present other depositions or discovery requests and
16 responses.

17 By making the foregoing disclosures, defendants are preserving the right to present said
18 Exhibits and are not admitting the admissibility of such exhibits nor waiving the right to object to
19 the admissibility, in whole or in part, of any said exhibits.

20 Respectfully submitted,

21 DATED: January 19, 2020

CLAPP, MORONEY, VUCINICH, BEEMAN
and SCHELEY, A PROFESSIONAL
CORPORATION

22 By: /s/ Jeffrey M. Vucinich
23 Jeffrey M. Vucinich
24 Elizabeth D. Rhodes
25 Attorneys for Defendants
26 EAST PALO ALTO POLICE OFFICERS
27 DANIEL CANCELLA and
28 ROBERT STEVE HUMRICH

**YOUNG v. CITY OF EAST PALO ALTO OFFICERS DANIEL CANCELLA and
STEVE HUMRICH, et al.**

U.S. District Court, Northern District of California Case No. 4:18-cv-01931-DMR

PROOF OF SERVICE - Civil

[Code of Civ. Proc. §§ 1011, 1013, 1031a, 2015.5]

METHOD OF SERVICE:

- ☐ By Personal Service ☐ By Mail ☐ By Overnight Delivery
☐ By Messenger Service ☐ By Facsimile ☒ By E-Mail/Electronic Transmission

1. I am a citizen of the United States and am employed in the County of San Mateo, State of California. I am over the age of 18 years and not a party to the within action.
2. My place of employment is 1111 Bayhill Drive, Suite 300, San Bruno, CA 94066.
3. On the date set forth below, I caused to be served a true and correct copy of the document(s) described as:

DEFENDANTS' PROPOSED TRIAL EXHIBIT LIST

4. I served the document(s) on the persons below, as follows:

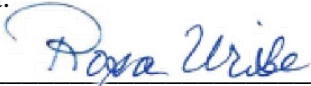
M. Alieu Iscandari, Esq. Iscandari & Associates 303 Hegenberger Road, Suite 311 Oakland, CA 94621 Tel: (510) 606-9062 Fax: (510) 803-5684 email: izcan79@gmail.com Attorneys for Plaintiff STEVEN YOUNG	Tiega-Noel Varlack, Esq. Varlack Legal Services 225 W. Winton Avenue, Suite 207 Hayward, CA 94544 Tel: (510) 397-2008 Fax: (510) 397-2997 email: Tiega@varlacklegal.com Attorneys for Plaintiff STEVEN YOUNG
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5. The document(s) was served by the following means (specify):
 - a. ☐ **BY PERSONAL SERVICE.** I caused to be personally delivered the document(s) to the persons at the addresses listed in item 4. (1) For a party represented by an attorney, delivery was made to the attorney or at the attorney's office by leaving the documents in an envelope or package clearly labeled to identify the attorney being served with a receptionist or an individual in charge of the office. (2) For a party, delivery was made to the party or by leaving the documents at the party's residence with some person not less than 18 years of age between the hours of eight in the morning and six in the evening.

1 ☒ (State) I declare under penalty of perjury under the laws of the State of California that
2 the foregoing is true and correct.

3 ☐ (Federal) I declare that I am employed in the offices of a member of the bar of this
4 court at whose direction this service was made. I declare under penalty of perjury that the
5 foregoing is true and correct.

6 Executed on January 19, 2019, at San Bruno, California.

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Rosa Uribe